

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

OurPet's Company,

Plaintiff

v.

Loving Pets, Corp.,

Defendant.

Civil Action Number: 1:15-cv-00768-DAP

Judge Polster

**DEFENDANT LOVING PETS, CORP.'S
ESTIMATE/BUDGET OF AMOUNT OF
FEES AND EXPENSES**

Defendant, Loving Pets, Corp., by and through counsel, pursuant to this Court's Case Management Conference Scheduling Order (Doc. #14), hereby submits the following preliminary estimate/budget of amount of fees and expenses. The Defendant will seek an award of attorney's fees in this action pursuant to statutory authority, 35 USC § 285 *et seq.*, and case law, *Octane Fitness, LLC v. ICON Health & Fitness, Inc.*, Case No. 12-1184 (Apr. 29, 2014) and *Highmark Inc. v. Allcare Health Mgmt. Sys. Inc.*, Case No. 12-1163 (April 29, 2014). Preliminary estimate and/or budget of the amount of fees and expenses anticipated: **TOTAL = \$660,000**

ATTORNEY'S FEES

COSTS

Preliminary Investigation and Filing Complaint	\$ 30,000	Depositions	\$ 60,000
Procedural Motion Practice	\$ 30,000	Experts	\$ 75,000
Discovery	\$125,000	Witness Fees	unknown
Dispositive Motion Practice	\$ 60,000	Other	\$ 15,000
Settlement Negotiations	\$ 15,000		
Trial/Trial Preparation	\$250,000		

TOTAL FEES: _____ **\$510,000** **TOTAL COSTS:** _____ **\$150,000**

Respectfully submitted,

Dated: August 20, 2015

/s/ F. Michael Speed, Jr.
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Counsel for Defendant Loving Pets, Corp.

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2015, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's Electronic Filing System.

/s/ F. Michael Speed, Jr.
F. Michael Speed, Jr.